

**IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a)	
ADAMSWELLS; and CONSOLIDATED)	
TELEPHONE COMPANY d/b/a CTC,)	
)	
Plaintiffs,)	No. 1:19-cv-07190
)	
vs.)	Judge Sharon Johnson Coleman
)	Magistrate Judge Jeffrey T. Gilbert
T-MOBILE USA, INC.; and)	
INTELIQUENT, INC.,)	
)	
Defendants.)	

**T-MOBILE USA, INC.’S MOTION
FOR JUDGMENT ON THE PLEADINGS WITH RESPECT TO
PLAINTIFFS’ CONSPIRACY AND PUNITIVE DAMAGES CLAIMS**

T-Mobile USA, Inc. (“TMUS”) respectfully moves pursuant to Federal Rule of Civil Procedure 12(c) for judgment on the pleadings. The grounds for this motion are (i) plaintiffs have failed to state a cognizable civil conspiracy claim under appropriate state law and (ii) because plaintiffs have failed to state a cognizable conspiracy claim, they have failed to state a claim for which punitive damages are an available remedy. Before filing this motion, TMUS’s counsel asked counsel for plaintiffs whether plaintiffs would withdraw their conspiracy claim against TMUS. Counsel for Plaintiffs declined to do so unconditionally. WHEREFORE, TMUS requests that this Court grant this motion, and order any other such relief that the Court deems just and proper.

Dated: February 24, 2023

Respectfully submitted,

/s/ Nigel F. Telman

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CERTIFICATE OF SERVICE

The undersigned attorney, on oath, certifies that on February 24, 2023, he served the foregoing Motion for Judgment on the Pleadings With Respect to Plaintiffs' Conspiracy and Punitive Damages Claims, together with its accompanying memorandum of law, via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/Nigel F. Telman
Nigel F. Telman